2001 APE

PATRICK J. SMITH **Environmental Engineer** (304) 234-2669

April 20, 2001

OHIO ENVIRONMENTAL PROTECTION AGENCY Southeast District Office 2195 Front Street Logan, Ohio 43138-9031

Attn:

Mr. Richard Stewart District Representative

Division of Hazardous Waste Management

RE:

RESPONSE TO MARCH 19, 2001 OEPA LETTER

WHEELING PITTSBURGH STEEL CORP.

MARTIN FERRY PLANT, MARTINS FERRY, OH

Dear Mr. Stewart:

This letter is in response to your correspondence, dated March 19, 2001, related to hazardous waste management requirements at Wheeling-Pittsburgh Steel Corporation's (WPSC) Martins Ferry, Ohio Plant.

The following are our responses to your concerns, listed corresponding to the March 19 letter:

Prohibitions

WPSC disagrees that it is or was in violation of Ohio hazardous waste laws, and disagrees with the characterization of its activities as presented in your letter.

Closure Plan

Based on the observation made by USEPA, OEPA, and WPSC during the June, 1999 inspection, work (that would qualify as a generator closure of the ARCO ductwork and area), as provided in ORC 3745-66-11 (A) & (B) and 3745-66-14 was promptly performed. As you indicate, a report on these activities was provided to OEPA in correspondence dated November 30, 2000. In response to your request, WPSC had the sediments (and liquids) removed from the stormwater collection basin on April 5, 2001 by vacuum truck and containerized in a labeled, 55-gallon drum. Based on the analysis of representative sample of these sediments, we have determined them to be non-hazardous, and they will be disposed at a licensed non-hazardous solid waste landfill. The analysis is included as Attachment 1.



Mr. Richard Stewart April 20, 2001 Page Two

Content of Contingency Plan

The Martins Ferry Contingency Plan will be revised to address concerns raised in the OEPA letter. The revision is planned for completion by June 30, 2001.

Maintenance and Operation of facility

Plant personnel have been reminded to prevent exposure of waste materials to the environment.

Testing and maintenance of equipment

Please note the inventory of spill absorbents ("floor dry") is recorded on the weekly hazardous waste inspection logs. The fire protection equipment is recorded on a separate sheet. Logs from inspections for a minimum of one month are included as Attachment 2.

Accumulation time of hazardous waste

The trash container in these areas have been labeled "Trash Only - Ink Waste Prohibited" to clarify to our personnel the purpose of these containers. This item will also be emphasized in the annual hazardous waste training, which is attended by all personnel handling waste ink items. A photograph of the trash container is included as Attachment 3.

Management of Containers

The requested photographs are included as Attachment 4.

Used Oil Storage Requirements for Generators

Shortly following the June, 1999 inspection, the Used Oil tank was taken out of service. Subsequently, this tank and contaminated soil in this area have been removed. Photographs of the area following tank removal and cleanup are included as Attachment 5. Used Oil is currently accumulated in portable containers stored under cover.

Mr. Richard Stewart April 20, 2001 Page Three

General Comment

Upon review of our records, no indication was found of an upset condition at the WWTP on October 20, 1999 corresponding to the higher than normal lead concentration in effluent. However, the sludge generated at the WWTP is a result of operations conducted over several days. This effluent result is considered an outlier, and is not expected to have had any significant impact on lead content in the sludge.

If you have any questions regarding this submittal, please contact me at (304) 234-2669.

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Patrick J Smith

Environmental Coordinator

Attachments

cc:

Ken Komoroski (Kirkpatrick & Lockhart)

Todd Koget

BES/ECMF 1.4.5.2

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April 10, 2001

Mr. Patrick J. Smith Wheeling Pittsburgh Steel Corporation 1134 Market Street Wheeling, WV 26003

Dear Mr. Smith:

Enclosed are analytical results for samples submitted to Antech Ltd. by Wheeling Pittsburgh Steel Corporation. The samples were received on April 5, 2001. Please reference Antech project number 01-1690 when inquiring about this report.

Client Site: Martin's Ferry Plant

Client Ref.: MF-TAK-01005

Client Sample Identification						
MF-TAK-01005						

General Comments: None

Please call me if you have any questions regarding the information contained within this report.

Sincerely,

Penelope J. Morris Project Coordinator

PJG: Imy

Enclosures

cc: Todd Koget, Wheeling Pittsburgh Steel Corporation

Antech Ltd.

Mr. Patrick J. Smith Wheeling Pittsburgh Steel Corporation 1134 Market Street Wheeling, WV 26003

Client Site: Martin's Ferry Plant

Client Ref.: MF-TAK-01005

Lab Project ID:

01-1690 0104-0341

Lab Sample ID: Client Sample ID:

MF-TAK-01005

Sample Matrix:

Solid

Date Sampled: Date Received:

04/05/2001 04/05/2001

General Chemistry

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Cyanide (Reactive)	9012A ⁽¹⁾	<1.0	1.0	mg/kg	TAT	04/06/2001	040609-12	<1.0
Flash Point	1010 ⁽¹⁾	>200	1.0	F	TAT	04/09/2001	N/A	N/A
pH	9045(1)	5.09	1.00	рН	EAC	04/05/2001	040509-24	NAP
Sulfide (Reactive)	9030(1)	<10	10	mg/kg	AME	04/05/2001	040509-27	<10

Metals

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Arsenic	TCLP/6010B(1)	<0.050	0.050	mg/l	MLW	04/06/2001	040907-03	<0.050
Barium	TCLP/6010B ⁽¹⁾	9.7	1.0	mg/l	MLW	04/06/2001	040907-03	<1.0
Cadmium	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	MLW	04/06/2001	040907-03	<0.050
Chromium	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050
Lead	TCLP/6010B ⁽¹⁾	0.82	0.050	mg/l	MLW	04/06/2001	040907-03	<0.050
Mercury	TCLP/7470 ⁽¹⁾	<0.010	0.010	mg/l	AJB	04/06/2001	040607-06	<0.010
Selenium	TCLP/6010B ⁽¹⁾	<0.10	0.10	mg/l	MLW	04/06/2001	040907-03	<0.10
Silver	TCLP/6010B ⁽¹⁾	<0.050	0.050	mg/l	WJM	04/06/2001	040907-03	<0.050

⁽¹⁾ U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: None

Antech Ltd.



Antech Ltd. Chain of Custody Record

Attachment	T,	Page	3	
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Attachment 2 Page 1

Wheeling-Pittsburgh Steel Corporation Martins Ferry Plant

Weekly Inspection of Fire Protection Equipment in Hazardous Waste Storage Areas

Each week, the fire extinguishers in the ink/paint waste accumulation areas must be inspected. There are two areas in the plant which require this weekly inspection. These areas are:

Copy RET.

- 1) 36" / 48" Line Collection Area
- 2) 60" Line Collection Area

Instructions for completing the table below:

- · record the date
- mark "OK" in the locations which were inspected with no problems
- provide an explanation if a problem is found
- sign

Note: If an extinguisher fails inspection, report the problem to the Safety Department as soon as possible.

Date	36"/48" Collection Area	60" Collection Area	Comments	Signature
8-15-00	OL	OK		Bol Turn
8-22-00	OK	OK	TO MANY EMPTY CANS	Bob Tuner
9-29-00	OK	OK	CLEANED 4P(JOB)	Bob Tuner Bob Tuner
1-01-00	OK	1K	, ,	Bob Tom
7-8-00	OK	OK		Bot Tuevo
1-13-00	OK	OK		Bob Tuner
1-18-00	_rik	OK		Bob Timer
- 25-00	OK	OK		Rob Juner
10-02-00	OK	OK		Bot Turer
	-		•	

Send completed form to Larry Boroski at mail stop MF16.

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Attachment 2 INSPECTED BY: : X. B. WAL (PLANT #2) MAZARPOUS WASTE STORAGE Pagé 2 DATE: 9-1-00 TIME: 9:10. NVENT AY FORM **ACCUMULATION** NUMBER OF LABELLED CONDITION (LEAKING?) START DATE TYPE OF WASTE CONTAINERS YES/NO GOOD-BOX#222067 Chromium Chin Treat 1-20 Vd. 7-20-00 YES Tarp Ou Box. & Floor Dry. BOX 6000-Box #303030 48" 460 "alkale Tank 1-30 Yd. Taip On Box Sludge Waste Box Hydrockloue acid No Box Du Site 1-30 Yd. 5 hidge Waste BOX Floor Dry In Stones 125 Bags

(PLANT #2) Attachment 2 INSPECTED BY: : O 2200 1AZARPOUS WASTE STORAGE DATE: 9-8-00 TIME: 12 NVENT ... IY FORM NUMBER OF LABELLED ACCUMULATION CONDITION (LEAKING?) TYPE OF WASTE YES/NO START DATE CONTAINERS 7-20-00 GOOD BOX# 222047 Chromium Chin Treat 1-20 Vd. YES. Tarp On Box & Floor Dry. Box 6000-Box # 303030 48" 460 "alkali Tank 1-30 Yd Taye On Box Box# No Box On Site Sludge Waste Box Hydrockloric acid 1-30 Vd. 5 hidge Waste Box Floor Dry In Stone

HAZARDOUS WASTE STORAGE NVENT ... Y FORM (PLANT #2) Attachment 2 Page 5 DATE: 9-12-00 TIME: 1:00

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TYPE OF WASTE	NUMBER OF CONTAINERS	LABELLED YESINO	ACCUMULATION START DATE	CONDITION (LEAKING?)
Chromium Chem Treat	1-20 Vd.	YES:	7-20-00	CONDITION (LEAKING?) COOD-BOX#222067 Toup On Box
48" 460" alhali Tauh Sludge Waste	1-30 Yd.	:		GOOD Box = 303030 Tarp QuBox
Hydrochloue acid	1-30 Vd.			No Box On Site
Floor Dry In Stone				
				·.
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Solid Waste Container 60-Inch Galvanize Line

Attachment 4



Satellite Waste Ink Container at 48-Inch Galvanize Line (Properly Closed)